

# Eight 31 Capital

Legal & Compliance

## **ATLAS Data Retention Policy**

Effective Date: March 13, 2026

### ***1. Purpose***

This policy describes how financial and operational data accessed through ATLAS integrations is retained and managed.

### ***2. Data Retention***

ATLAS retains financial and operational records only as long as necessary to support accounting operations, reporting requirements, and applicable regulatory obligations.

### ***3. Access Restrictions***

Access to stored financial data is limited to authorized personnel within Eight 31 Capital using role based permissions.

### ***4. Data Removal***

Financial institution connections may be disconnected at any time. When connections are removed, access tokens are revoked and ATLAS ceases retrieval of financial data from the associated institution.

### ***5. Review***

Data retention practices are periodically reviewed to ensure appropriate operational and security safeguards.